

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

Stanley Zhong and Nan Zhong, as next
Friend of his Minor Son,

Plaintiffs,

v.

Case No. 2:25-cv-10579
Hon. Judith E. Levy
Mag. Judge David R. Grand

The Regents of the University of Michigan,
in their official capacities; The University
of Michigan; Santa Ono, in their individual
and official capacity as the former President of
the University of Michigan; Domenico Grasso,
in their individual and official capacity as the
current President of the University of
Michigan; Adele C. Brumfield, in their
individual and official capacity as the Vice
Provost for Enrollment Management at the
University of Michigan; Other persons
Does 1-10 acting in concert with those named
Above,

**ORAL ARGUMENT
REQUESTED**

Defendants.

Stanley Zhong
211 Hope St, #390755
Mountain View, CA 94039

Nan Zhong, *as next friend of
his minor son.*
211 Hope St #390755
Mountain View, CA 94039
425-698-9139
nanzhong1@gmail.com

Brian M. Schwartz (P69018)
Sydney G. Rohlicek (P85655)
MILLER, CANFIELD, PADDOCK
AND STONE, P.L.C.
150 W. Jefferson Ave., Suite 2500
Detroit, MI 48226
(313) 963-6420
Attorneys for University Defendants
schwartzb@millercanfield.com
rohlicek@millercanfield.com

**BRIEF IN SUPPORT OF DEFENDANTS' MOTION
TO DISMISS FIRST AMENDED COMPLAINT**

Exhibit List

Exhibit 1 *Students for Fair Admission, Inc. v President and Fellows of Harvard College, et al.*, Brief for the University of Michigan as *Amicus Curiae* in Support of Respondents, dated August 2022

Exhibit 2 Unpublished Cases

Ali v Univ of Michigan Health Sys-Risk Mgmt, 2012 WL 3112419
(E.D. Mich. May 4, 2012)

Castillo v. Whitmer, 823 F. App'x 413 (6th Cir. 2020)

Doe v. New York Univ., 2024 WL 2847368 (S.D.N.Y. May 30, 2024)

Foster v. Michigan, 573 F. App'x 377 (6th Cir. 2014)

Frazier v. Michigan, 41 F. App'x 762 (6th Cir. 2002)

Gilmore v. Corr. Corp. of Am., 92 F. App'x 188 (6th Cir. 2004)

Grant v. Metro. Gov't of Nashville & Davidson Cnty., Tenn., 446 F.
App'x 737 (6th Cir. 2011)

Heijnen v. Villareal, 2013 WL 950791 (N.D. Tex. Mar. 11, 2013)

Herndon v. Michigan Dep't of Corr., 2021 WL 1559156 (W.D. Mich.
Apr. 21, 2021)

Johnson v. City of Clarksville, 186 F. App'x 592 (6th Cir. 2006)

Lewis v. Michigan Occupational Safety & Health Admin., 2013 WL
5999243 (E.D. Mich. Nov. 12, 2013)

Martinson v. Regents of the Univ. of Michigan, 2011 WL 13124122
(E.D. Mich. Sept. 28, 2011)

Martinson v. Regents of Univ. of Michigan, 562 F. App'x 365 (6th Cir.
2014)

Matthews v. Craige, 2016 WL 3522320 (E.D. Mich. June 28, 2016)
(Ludington, J.)

Nali v. Ekman, 355 F. App'x 909 (6th Cir. 2009)

In re Ohio Execution Protocol Litig., 709 F. App'x 779 (6th Cir. 2017)

Shepherd v. Univ. of Kentucky, 2016 WL 4059559 (E.D. Ky. July 28, 2016)

Stanford v. Northmont City Sch. Dist., 2023 WL 1819117 (S.D. Ohio Feb. 8, 2023)

Turnboe v. Gundy, 25 F. App'x 292 (6th Cir. 2001)